
Classification and Price Adjustments
for First-Class Mail and Standard Mail
Initiatives

Docket No. R2011-1

**MOTION OF THE SATURATION MAILERS COALITION AND VALASSIS
DIRECT MAIL, INC. TO SUBMIT REPLY COMMENTS TO AMERICAN
CATALOG MAILERS ASSOCIATION AND NEWSPAPER ASSOCIATION OF
AMERICA**

(December 1, 2010)

The Saturation Mailers Coalition and Valassis Direct Mail, Inc. hereby move to submit reply comments on the Postal Service's proposal to implement a volume incentive program for Standard Saturation and High-Density mail. These comments address aspects of the initial comments filed by the American Catalog Mailers Association (ACMA) and the Newspaper Association of America (NAA).

Our reply to the initial comments of ACMA concurs with its correct analysis that the incentive program does not justify any adjustment to the price cap, a core position that refutes its alternative proposal which would apply an adjustment to Saturation and High-Density mail only. Our reply to the initial comments of NAA addresses mischaracterizations of the marketplace and Postal Service actions, including the nature and effect of the Postal Service's original Saturation Incentive program. In addition, NAA's comments raise serious questions about how the current proposal might be implemented by the Postal Service.

Because these initial comments raise arguments and issues that could not have been anticipated and addressed in our initial comments, we respectfully move that we be granted leave to address them through reply comments.

Respectfully submitted,

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